

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2020-14-C

IN RE:

Application of TracFone Wireless, Inc. (SafeLink)	
Wireless Inc.) for Designation as an Eligible)	
Telecommunications Carrier ("ETC") in the State)	ETC ANNUAL REPORT
of South Carolina for the Limited Purpose of)	
Offering Lifeline Service to Qualified Households)	

Pursuant to regulation 103.690 of the South Carolina Public Service Commission ("Commission"), SafeLink Wireless Inc. ("SafeLink") hereby submits this Eligible Telecommunications Carrier ("ETC") Annual Report

I. BACKGROUND

The Commission, Order 2010-231, dated March 31, 2010, designated SafeLink as an ETC pursuant to 47 U. S.C. § 214(e)(2). By letter dated May 1, 2008, the Commission informed the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") of this designation. The Commission's initial certification to the FCC and USAC was effective March 31, 2010, the date of its Order designating SafeLink as an ETC. Pursuant to sections 54.313 and 54.314 of the FCC's rules, which require states to establish an annual certification process for rural and non-rural carriers receiving federal low income support, SafeLink submits this annual report for the purpose of extending its ETC designation and the Commission's certification of SafeLink's entitlement to receive federal low income support for the 2021 calendar year.

II. ANNUAL REPORTING REQUIREMENTS

1. **Certification of compliance with CTIA Consumer Code or service quality standards in 103-663.**

SafeLink certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA – The Wireless Association® Consumer Code for Wireless Service, as it is required to do pursuant to Section 54.202(a)(3) of the Federal Communications Commission’s rules (47 C.F.R. § 54.202(a)(3)).

2. **Progress Report of two-year plan for advertising and outreach.**

SafeLink/TracFone works with an external Advertising Agency to develop advertising strategies with the goal of creating awareness by target audience. In South Carolina SafeLink/TracFone advertises annually via national cable stations, but focuses most of its advertising resources through banner ads and other digital advertising which is a more efficient means of reaching target consumers.

Also, Retailers and Social Service organizations are provided with signage to be displayed where SafeLink/TracFone products are offered and with printed materials describing the SafeLink Lifeline program.

3. Requests for service that were unfulfilled.

None. SafeLink only provides Lifeline service to individuals in South Carolina who qualify to receive Lifeline service. All requests for SafeLink Wireless service by South Carolina residents who have been able to qualify for Lifeline support have been fulfilled.

4. Number of complaints or trouble reports per 1,000 handsets.

The number of complaints per thousand handsets in South Carolina in 2019 was 0.28.

5. Certification of compliance with service quality standards and consumer protection rules.

SafeLink certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA – The Wireless Association® Consumer Code for Wireless Service, as it is required to do pursuant to Section 54.202(a)(3) of the Federal Communications Commission’s rules (47 C.F.R. § 54.202(a)(3)).

6. Detailed report and certification that the ETC is able to function in emergency situations.

SafeLink certifies that it will be able to function in emergency situations to the extent that its underlying network providers are able to do so. SafeLink provides service in South Carolina using the networks of several of the leading wireless companies in the nation, including Verizon Wireless, AT&T Mobility, and T-Mobile. SafeLink relies on those networks’ reliability in all

situations, including emergency situations. Each of those companies complies with applicable requirements for emergency service, including available power supplies. Those network operators have implemented state-of-the-art network reliability standards and SafeLink and its customers benefit from their high standards. Throughout its more than ten years of existence, SafeLink's service reliability has compared favorably with that of any facilities-based operator in the wireless telecommunications industry.

7. Certification that the ETC is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas.

SafeLink certifies that it offers a local usage plan "comparable" to those of the incumbent LECs serving relevant service areas. However, SafeLink notes that "comparable" does not mean "identical." There are significant differences between wireline and wireless service offerings. Unlike traditional wireline offerings, SafeLink does not offer unlimited local service at flat rates. Instead, its service may be used by customers for all manner of calls – local, long distance, intrastate, and interstate, as well as international calls to more than 60 destinations. There are no separate toll charges and no roaming charges. In addition, SafeLink customers receive at no additional charge such vertical service features as call waiting and caller ID. Typically, incumbent wireline LECs charge additional fees for such service features. Given these intrinsic differences between wireline and wireless services, SafeLink's SafeLink Wireless service is comparable with that provided by wireline incumbent LECs.

8. Certification that the carrier acknowledges that the [FCC] may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

SafeLink certifies that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area. However, SafeLink reminds the Commission that its wireless service includes calling to all locations (including locations which would involve payment of toll charges if provided by ILECs). Since SafeLink, unlike wireline carriers, including wireline ETCs, does not impose separate charges for what those wireline carriers call “toll” calls, it seems highly improbable that any SafeLink customer would want to equal access to long distance carriers since use of SafeLink’s service to place long distance calls would still incur wireless airtime charges.

9. Number of Lifeline Customers as of December 31, 2019.

The number of Safelink customers as of December 31, 2019 was **17,680**.

10. Copies of responses to Lifeline Verification Survey or Certification filed with USAC on August 31, 2011.

Please note that this Survey has been eliminated as a result of the FCC Lifeline Reform Order. SafeLink has submitted copies of its FCC Form 481 and FCC Form 555.

<signature page follows>

Respectfully Submitted,

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VERIFICATION

State of Florida

County of Miami-Dade

Stephen Athanson, under penalty of perjury, states the following:

1. I am Senior Attorney for SafeLink Wireless, Inc. ("SafeLink"). I am authorized to make this verification on behalf of Safelink.

2. I have read SafeLink's Annual ETC Report for 2020. I confirm that the information contained therein is true and correct to the best of my knowledge.

I declare and certify that the matters addressed above are within my personal knowledge and are true and correct.¹



Stephen Athanson

¹ See South Carolina Sup. Ct. Order 2020-04-22-01, "Operation of the Trial Courts During the Coronavirus Emergency (As Amended April 22, 2020)," Section 16 (Certification in Lieu of Affidavit).